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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**INDEX NEWSPAPERS LLC**, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**DECLARATION OF JUSTIN YAU IN SUPPORT OF EXTENDING TEMPORARY RESTRAINING ORDER AGAINST DEFENDANTS U.S. DEPARTMENT OF HOMELAND SECURITY AND U.S. MARSHALS SERVICE**

I, Justin Yau, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a student at the University of Portland studying communications under the G.I. Bill, with a focus on journalism; before that, I served in the U.S. Army, where I was deployed to the Middle East in support of Operation Inherent Resolve. I have covered protests in Hong Kong and Portland. My work has been published in the *L.A. Times*, the *Daily Mail*, *Reuters*, *Yahoo! News*, *The Sun*, *Spectee* (a Japanese news outlet), NBC, and msn.com. I have attended the protests in Portland as a freelance and independent journalist for the purpose of documenting and reporting on them.

2. I have covered protests in Hong Kong, where the authorities were using extreme force, including large scale deployment of tear gas and rubber bullets, to suppress protesters. The protests were chaotic and sometimes violent. They were much bigger than the protests in Portland.

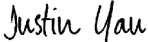
3. When I covered the protests in Hong Kong, I wore my press pass, as well as a helmet and vest that said "PRESS." Despite their substantial use of force against protesters, Hong Kong police were generally conscientious about differentiating between press and protesters.

4. Specifically, the Hong Kong police would walk past press personnel for the most part, and if they were conducting a massed charge or "bull rush," they would charge past press personnel and allow them to continue reporting from behind police lines. Press were allowed to stay behind police lines unless they got too close to an officer.

5. This was standard police behavior in Hong Kong from December 2019 to January 2020, when I reported there. I am aware that at other times, the Hong Kong police have been less solicitous of press freedoms, and I certainly would not say that overall the Hong Kong police are better than the law enforcement personnel I have encountered in Portland.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: August 2, 2020

DocuSigned by:  
  
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Justin Yau